

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

“Baby L.” a minor, by and through her legal guardians and next friends, DOE 1 and DOE 2, DOE 1, individually and as next friend of “Baby L., and DOE 2, individually and as next friend of “Baby L.”

*Plaintiffs,*

v.

Dr. MARK ESPER, in his official capacity as Secretary for the United States Department of Defense; MICHAEL POMPEO, in his official capacity as Secretary for the United States Department of State, DONNA WELTON, in her official capacity as Assistant Chief of Mission, United States Embassy Kabul (USEK), DOE DEFENDANTS 1-20, in their official capacities,

*Defendants.*

Civil Action No. \_\_\_\_\_

**PLAINTIFFS’ MOTION FOR LEAVE  
TO PROCEED USING PSEUDONYMS  
AND TO FILE AND PROCEED  
UNDER SEAL**

The plaintiffs file this action under pseudonyms to protect themselves from harassment, and physical harm. Accordingly, the plaintiffs respectfully move for an order providing that the plaintiffs may proceed with this action using pseudonyms. Due to the nature of the case impacting the rights of a minor child, the concern for the future physical safety of the plaintiff’s and their other minor children, and the sensitive nature of the information relating to this case, the plaintiffs respectfully request that the Court grant them leave to file their Memorandum in support of this motion, the Complaint and supporting exhibits, and the Memorandum in support of the Complaint, under seal.

The grounds for this Motion are set forth in the accompanying Memorandum.

Respectfully Submitted,

/s/  
DOE 1

/s/  
DOE 2

BY:

Dated: February 26, 2020

/s/ Richard L. Mast

Richard L. Mast (VA Bar No. 80660)

LIBERTY COUNSEL

P.O. Box 540774

Orlando, FL 32854-0774

*court@lc.org*

(800) 671-1776

P.O. Box 11108

Lynchburg, VA 24506

(434) 592-7000

*Attorney for Plaintiff*